

---

**From:** Sam Ollinger  
**Sent:** Friday, February 14, 2014 3:39 PM  
**To:** CEQA Guidelines  
**Subject:** LOS Alternatives

Dear Mr. Calfee,

Thank you for the opportunity to offer feedback on the Preliminary Evaluation of Alternative Methods of Transportation Analysis

[<http://opr.ca.gov/docs/PreliminaryEvaluationTransportationMetrics.pdf>].

As noted, SB 743 provides an opportunity to ensure that the original goals of CEQA are implemented in a manner that is sensitive and attentive to California's environmental issues along with acknowledging California's continued population growth and prominence in a globally competitive business marketplace. This update provides an opportunity to also ensure that the goals of CEQA are not misunderstood and misinterpreted and we are very pleased that a new evaluation will provide agencies around the state clarity within which they can implement projects to ensure a livable, thriving, and sustainable California.

As noted by the OPR, recognizing the role that LOS plays within CEQA analysis is critical. Our comments are as follows.

1. We recommend Automobile Trips Generated (ATG) as a metric to determine environmental impact. Besides being the easiest to calculate, it would address the core deficiency within the existing metric of utilizing LOS to determine environmental impact - in that it unintentionally pits one group of users (vehicle drivers) against another (non-motorized users). By deliberately not accounting non-automotive modes of transportation, it ensures that agencies are not unduly burdened with having to account for any number of travel modes employed by Californians such as transit, walking, bicycle, skateboard, roller-blades, or push scooters (to name a few). This also ensures that active forms of transportation are (silently) supported while the modes that do cause environmental harm through noise, air pollution, excessive wear and tear on our road infrastructure - are accounted for to ensure that their impact can be adequately addressed. If ATG is utilized, this will give OPR an opportunity to institute a level of rigor and scientific analysis to determine whether ATG is indeed the most useful metric to be employed. Adopting a metric that is costly to implement could result in similar problems that LOS has revealed over the last two decades. We also recommend an annual review to ensure that the metric adopted is consistent with both CEQA and SB 375 to ensure compliance with the state's goals of reducing greenhouse gas emissions.

2. We recommend that the new metric adopted by the OPR is prioritized in communities with highest population density and health disparities to address issues of health and equity. Often the most urbanized areas of California have been disproportionately and negatively affected by projects that have relied on LOS as a metric to ensure vehicle throughput and access. For example, City Heights in San Diego and East Los Angeles are both communities that are home to residents with higher than average health problems largely caused by highway projects solely

designed to ensure vehicle throughput and access. These residents also tend to be lower on the income scale which limits their mobility choices within a transportation paradigm that has historically prioritized automobile throughput over all modes of transportation. Assuming that the new metric will be rolled out in phases, we recommend that the focus is placed on communities disproportionately affected by past policies as it relates to LOS. Communities with the highest population densities also tend to have higher number of destinations to which mobility access is extremely important and as such issues of equity can be address with an implementation strategy that focuses on these communities.

3. In addition to minimizing harm to the environment, any new criteria adopted should also seek to reduce harm to the environment - be it reducing the number of vehicle lanes to ensure fiscal conservativeness with regard to our road infrastructure's ongoing maintenance costs, or actively working on ensuring areas around sensitive environmental regions (as it relates to California's natural resources) remain undeveloped or are moved toward a state of existence prior to development.

4. We strongly recommend against employing any metric that utilizes Fuel Use as a factor. Fuel efficiency use within vehicles are always getting better, however, continuing to promote automobile use moves the focus away from healthier alternatives and incentivizes driving instead of addressing public health problems that can be alleviated through promoting a multi-modal transportation system.

Thank you for taking these issues into consideration.

Sincerely,

----

Samantha Ollinger

**Mission:** To establish San Diego as a world-class bicycling city by promoting everyday riding. We do this by advocating for and promoting world-class bicycling infrastructure that contributes toward an aesthetic, livable urban environment.

Not a member? You really should consider [joining us.](#)

